

REMARKS

Please reconsider the application in view of the above amendments and the following remarks. Applicants thank the Examiner for carefully considering this application and for indicating that the Information Disclosure Statements submitted on November 29, 2006, January 25, 2007, September 7, 2007, and June 19, 2008 have been considered.

Disposition of Claims

Claims 1-39 are pending in this application. Claims 1, 14, and 27 are independent. The remaining claims depend, either directly or indirectly, from claim 1, 14, and 27.

Examiner Interview

Applicants thank the Examiner for courtesies extended during the Examiner Interview conducted on April 14, 2010. During the Examiner Interview, Applicants' representative discussed proposed claim amendments and the cited prior art. The arguments and amendments presented in this response are substantially similar to those discussed during the Examiner Interview. At the close of the Examiner Interview, no agreement was reached. Applicants have reviewed the Interview Summary issued on April 20, 2010, and agree with its content.

Claim Amendments

Claims 1, 14, and 27 are amended to clarify aspects of the invention. Further, claims 2-6, 13, 15-19, 26, 28-32, and 39 are amended for conformity with the amendments to the independent

claims. No new matter has been added by way of these amendments as support for the amendments may be found, for example, on pages 28-29 of the originally-filed specification.

Rejection under 35 U.S.C. § 103

MPEP § 2143 states that “[t]he key to supporting any rejection under 35 U.S.C. 103 is the clear articulation of the reason(s) why the claimed invention would have been obvious. The Supreme Court in *KSR* noted that the analysis supporting a rejection under 35 U.S.C. 103 should be made explicit.” Further, when combining prior art elements, the Examiner “must articulate the following: (1) a finding that the prior art included each element claimed, although not necessarily in a single prior art reference, with the only difference between the claimed invention and the prior art being the lack of actual combination of the elements in a single prior art reference; ...” MPEP § 2143(A).

Claims 1-6, 9-11, 14-19, 22-24, 27-32, and 35-37

Claims 1-6, 9-11, 14-19, 22-24, 27-32, and 35-37 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,609,123 (“Cazemier”) in view of U.S. Patent Publication No. 2002/0165724 (“Blankestijn”). The rejection is respectfully traversed.

Amended independent claim 1 recites, in part, “a first source system for publishing a data change of an attribute of a first entity of the first source system, wherein said first entity is one of a first plurality of entities,” “a global object model coupled to said join engine peer, said global object model comprising a first mapped relationship ... wherein said first mapped relationship is used by said join engine peer to enforce data consistency between said first entity and said

second entity,” and “a third source system for storing said data change in said second entity formed by said join engine peer.” In other words, amended independent claim 1 requires, in part, a global object model including a mapped relationship for enforcing data consistency between a first entity stored on a first source system and a second entity stored on a third source system, where the second entity includes attributes from a second source system retrieved in response to a data change of the first entity.

In contrast, Cazemier discloses a reporting system that is capable of *extracting* data from various data sets. *See* Cazemier, column 5 at lines 58-64. Further, Cazemier discloses that the query engine is configured to fulfill requests for information using metadata describing the various data sets. *See* Cazemier, column 7 at lines 11-24. However, the metadata of Cazemier only determines the data sets to be retrieved and included in *reports*. *See* Cazemier, column 6 at lines 1-8. Cazemier is completely silent with respect to metadata for defining dependencies used to *enforce data consistency* between an entity of one source system and a separate entity of a different source system. In view of this, Cazemier fails to disclose or render obvious at least the aforementioned limitations of amended independent claim 1.

Further, Blankesteijn fails to provide that which Cazemier lacks. Blankesteijn discloses a system for updating data in business objects with data changes in source data objects. *See* Blankesteijn, paragraph [0042]. Further, Blankesteijn discloses that the data changes are published from the server to clients subscribed to the data changes. *See* Blankesteijn, paragraph [0095]. However, Blankesteijn fails to disclose the use of a global object model, or any equivalents, for *enforcing data consistency* between different entities of different source systems. Thus, Blankesteijn fails to disclose or render obvious at least the aforementioned limitations of amended

independent claim 1.

In view of the above, Cazemier and Blankesteijn, whether viewed separately or in combination, fail to disclose or render obvious each and every limitation of amended independent claim 1. Thus, independent claim 1 is patentable over Cazemier and Blankesteijn. Amended independent claims 14 and 27 include substantially similar limitations as amended independent claim 1 and, thus, are patentable over Cazemier and Blankesteijn for at least the same reasons. Dependent claims 2-6, 9-11, 15-19, 22-24, 28-32, and 35-37 depend, directly or indirectly, from claim 1, 14, or 27 and are patentable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

Claims 12-13, 25-26, and 38-39

Claims 12-13, 25-26, and 38-39 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Cazemier and Blankesteijn in view of U.S. Patent No. 5,787,415 (“Jacobson”). The rejection is respectfully traversed.

As discussed above, Cazemier and Blankesteijn fails to disclose at least the aforementioned limitations of amended independent claim 1. In addition, Jacobson fails to provide that which Cazemier and Blankesteijn lack. Jacobson discloses a decision support system configured to efficiently maintain a de-normalized relational database. *See* Jacobson, abstract. Specifically, Jacobson discloses that the complexity of maintaining the database “is minimized by alteration of the control files but not the utilities of previously known systems.” *See id.* However, Jacobson is completely silent with respect to using a global object model to *enforce data consistency* between

different entities of different source systems. Thus, Jacobson fails to disclose or render obvious at least the aforementioned limitations of amended independent claim 1.

In view of the above, Cazemier, Blankesteyn, and Jacobson, whether viewed separately or in combination, fail to disclose or render obvious each and every limitation of amended independent claim 1. Thus, independent claim 1 is patentable over Cazemier, Blankesteyn, and Jacobson. Amended independent claims 14 and 27 include substantially similar limitations as amended independent claim 1 and, thus, are patentable over Cazemier, Blankesteyn, and Jacobson for at least the same reasons. Dependent claims 12-13, 25-26, and 38-39 depend, directly or indirectly, from claim 1, 14, or 27 and are patentable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

Claims 7-8, 20-21, and 33-34

Claims 7-8, 20-21, and 33-34 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Cazemier and Blankesteyn in view of U.S. Patent No. 6,842,904 (“Bartz”). The rejection is respectfully traversed.

As discussed above, Cazemier and Blankesteyn fails to disclose at least the aforementioned limitations of amended independent claim 1. In addition, Bartz fails to provide that which Cazemier and Blankesteyn lack. Bartz discloses a versioning system that is capable of supporting diverse document formats and data types. *See* Bartz, abstract. Specifically, Bartz discloses an application program interface (API) that can be extended with plug-in protocol providers to support any number of version stores or versioning systems. *See id.* However, Bartz is completely silent with respect to using a global object model to *enforce data consistency* between different entities of different

source systems. Thus, Bartz fails to disclose or render obvious at least the aforementioned limitations of amended independent claim 1.

In view of the above, Cazemier, Blankesteyn, and Bartz, whether viewed separately or in combination, fail to disclose or render obvious each and every limitation of amended independent claim 1. Thus, independent claim 1 is patentable over Cazemier, Blankesteyn, and Bartz. Amended independent claims 14 and 27 include substantially similar limitations as amended independent claim 1 and, thus, are patentable over Cazemier, Blankesteyn, and Bartz for at least the same reasons. Dependent claims 7-8, 20-21, and 33-34 depend, directly or indirectly, from claim 1, 14, or 27 and are patentable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

Conclusion

Applicants believe this reply is fully responsive to all outstanding issues and places this application in condition for allowance. If this belief is incorrect, or other issues arise, the Examiner is encouraged to contact the undersigned or his associates at the telephone number listed below. Please apply any charges not covered, or any credits, to Deposit Account 50-0591 (Reference Number 03226/516001).

Dated: April 29, 2010

Respectfully submitted,

By /Robert P. Lord/
Robert P. Lord
Registration No.: 46,479
OSHA · LIANG LLP
909 Fannin Street, Suite 3500
Houston, Texas 77010
(713) 228-8600
(713) 228-8778 (Fax)
Attorney for Applicants